

FAIRFIELD SENTRY LTD. (IN
LIQUIDATION), et al.,

Plaintiffs,

v.

BNP PARIBAS SECURITIES NOMINEES
LTD., et al.,

Defendants.

Adv. Pro. No. 11-01579 (CGM)

FAIRFIELD SENTRY LTD. (IN
LIQUIDATION), et al.,

Plaintiffs,

v.

BNP PARIBAS FORTIS, et al.,

Defendants.

Adv. Pro. No. 11-01617 (CGM)

FAIRFIELD SENTRY LTD. (IN
LIQUIDATION), et al.,

Plaintiffs,

v.

BNP PARIBAS ESPAÑA, et al.,

Defendants.

Adv. Pro. No. 12-01551 (CGM)

**[PROPOSED] SCHEDULING ORDER FOR THE LIQUIDATORS' 30(b)(6)
DEPOSITIONS OF BNP DEFENDANTS AND RULE 37 MOTION PRACTICE**

IT IS HEREBY ORDERED, based on the agreement of counsel for Plaintiffs and Defendants BGL BNP Paribas S.A. (*f/k/a* BNP Paribas Luxembourg SA), BNP Paribas Securities Services Luxembourg, BNP Paribas (Suisse) SA (*f/k/a* BNP Paribas (Suisse) SA Ex Fortis and BNP Paribas (Suisse) SA Private), BNP Paribas Fortis (*f/k/a* Fortis Bank SA/NV), BNP Paribas

Securities Nominees Ltd. (*a/k/a* Harrier Holdings Ltd.), and BNP Paribas España (*f/k/a* Fortis Bank (España)) (collectively, the “BNP Defendants”), that:

1. The BNP Defendants will provide the Liquidators with the exact date and location for the taking of each Defendant’s Rule 30(b)(6) deposition, pursuant to the Notices of Deposition served by the Liquidators on October 18, 2022, by November 21, 2022;
2. The BNP Defendants shall produce any documents in connection with the Rule 30(b)(6) depositions no later than seven days before the first deposition is scheduled to take place;
3. The Rule 30(b)(6) depositions of the BNP Defendants shall be completed by December 16, 2022, unless the parties agree otherwise;
4. The Liquidators’ motions for related sanctions against the BNP Defendants under Rule 37 (if any) (“Sanctions Motions”) shall be filed on or before January 11, 2023;
5. The BNP Defendants’ oppositions to the Sanctions Motions shall be filed on or before February 1, 2023;
6. The Liquidators’ replies in further support of their Sanctions Motions shall be filed on or before February 8, 2023; and
7. The Court will hear argument on the Sanctions Motions at the February 15, 2023 omnibus hearing, or on such other date as the Court orders.

Dated: New York, NY
November _____, 2022

By: _____

HON. CHIEF JUDGE CECELIA G. MORRIS